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Attorney for Defendant
JOSHUA IVARSON

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA IVARSON,

Defendant.

No. 2:24-cr-0301 DJC

STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; FINDINGS AND
ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney JASON HITT, and the Defendant, JOSHUA IVARSON, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for a status conference before Judge Daniel J. Calabretta on July 31, 2025, with time excluded to that date.

2. By this stipulation, the defendant now moves to set the matter for a change of plea on August 7, 2025, and to exclude time between July 31, 2025, and August 7, 2025, under Local

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AND FOR EXCLUSION OF TIME

1 Code T4. Plaintiff does not oppose this request.

2 3. The parties agree and stipulate, and request that the Court find the following:

3 a. The government has represented that the discovery associated with this case
4 includes approximately 500 plus pages of investigative reports in electronic form, and some audio
5 and video files. All of this discovery has been either produced directly to counsel, and/or made
6 available for inspection and copying.

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8 b. Counsel for the defendant desires additional time to consult with her client and
9 relevant experts, discuss the upcoming change of plea, and to explain the consequences and
10 guidelines. Counsel also has a calendar conflict on July 31, 2025, and is required to be out-of-state
11 for an extended evidentiary hearing.

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13 c. Counsel for the defendant believes that failure to grant the above-requested
14 continuance would deny her the reasonable time necessary for effective preparation, taking into
15 account the exercise of due diligence.

16 d. The government does not object to the continuance.

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18 e. Based on the above-stated findings, the ends of justice served by continuing the
19 case as requested outweigh the interest of the public and the defendant in a trial within the original
20 date prescribed by the Speedy Trial Act.

21 f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
22 et seq., within which trial must commence, the time period of July 31, 2025, to August 7, 2025,
23 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
24 because it results from a continuance granted by the Court at defendant's request on the basis of
25 the Court's finding that the ends of justice served by taking such action outweigh the best interest
26

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1 of the public and the defendant in a speedy trial.

2 5. Nothing in this stipulation and order shall preclude a finding that other
3 provisions of the Speedy Trial Act dictate that additional time periods are excludable from the
4 period within which a trial must commence.

5 All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on
6 their behalf.

7
8 IT IS SO STIPULATED.

9 Dated: July 16, 2025

by: /s/Tasha Chalfant for
10 JASON HITT
Assistant U.S. Attorney
11 Attorney for Plaintiff

12 Dated: July 16, 2025

by: /s/Tasha Chalfant
13 TASHA CHALFANT
Attorney for Defendant
14 JOSHUA IVARSON

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ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, July 31, 2025, to and including August 7, 2025, change of plea hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the vacated status conference shall be reset for a change of plea on August 7, 2025, at 9:00 a.m.

IT IS SO FOUND AND ORDERED this 16th day of July, 2025.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

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